

ERIC GRANT
United States Attorney
KEVIN C. KHASIGIAN
Assistant U. S. Attorney
501 I Street, Suite 10-100
Sacramento, CA 95814
Telephone: (916) 554-2700

Attorneys for the United States

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

APPROXIMATELY \$282,500.00 IN
U.S. CURRENCY,

Defendant.

2:24-MC-00317-DJC-CKD

STIPULATION AND ORDER EXTENDING
TIME FOR FILING A COMPLAINT FOR
FORFEITURE AND/OR TO OBTAIN AN
INDICTMENT ALLEGING FORFEITURE

It is hereby stipulated by and between the United States of America and potential claimant Ronnie Borrego ("claimant"), by and through their respective counsel, as follows:

1. On or about May 15, 2024, claimant filed a claim in the administrative forfeiture proceeding with the Drug Enforcement Administration with respect to the above-referenced currency (hereafter "defendant currency"), which was seized on or about February 9, 2024.

2. The Drug Enforcement Administration has sent the written notice of intent to forfeit required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimant has filed a claim to the defendant currency as required by law in the administrative forfeiture proceeding.

3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for

1 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant
2 currency is subject to forfeiture within ninety days after a claim has been filed in the administrative
3 forfeiture proceeding, unless the court extends the deadline for good cause shown or by agreement of the
4 parties. That deadline was August 13, 2024.

5 4. By Stipulation and Order filed August 13, 2024, the parties stipulated to extend to October
6 11, 2024, the time in which the United States is required to file a civil complaint for forfeiture against the
7 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
8 forfeiture.

9 5. By Stipulation and Order filed October 8, 2024, the parties stipulated to extend to
10 December 10, 2024, the time in which the United States is required to file a civil complaint for forfeiture
11 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
12 subject to forfeiture.

13 6. By Stipulation and Order filed December 9, 2024, the parties stipulated to extend to
14 February 7, 2025, the time in which the United States is required to file a civil complaint for forfeiture
15 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
16 subject to forfeiture.

17 7. By Stipulation and Order filed February 6, 2025, the parties stipulated to extend to March
18 10, 2025, the time in which the United States is required to file a civil complaint for forfeiture against the
19 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
20 forfeiture.

21 8. By Stipulation and Order filed March 10, 2025, the parties stipulated to extend to April
22 24, 2025, the time in which the United States is required to file a civil complaint for forfeiture against the
23 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
24 forfeiture.

25 9. By Stipulation and Order filed April 24, 2025, the parties stipulated to extend to June 6,
26 2025, the time in which the United States is required to file a civil complaint for forfeiture against the
27 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
28 forfeiture.

1 10. By Stipulation and Order filed June 2, 2025, the parties stipulated to extend to July 21,
2 2025, the time in which the United States is required to file a civil complaint for forfeiture against the
3 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
4 forfeiture.

5 11. By Stipulation and Order filed July 21, 2025, the parties stipulated to extend to September
6 19, 2025, the time in which the United States is required to file a civil complaint for forfeiture against the
7 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
8 forfeiture.

9 12. By Stipulation and Order filed September 22, 2025, the parties stipulated to extend to
10 October 20, 2025, the time in which the United States is required to file a civil complaint for forfeiture
11 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
12 subject to forfeiture.

13 13. By Stipulation and Order filed October 21, 2025, the parties stipulated to extend to
14 November 19, 2025, the time in which the United States is required to file a civil complaint for forfeiture
15 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
16 subject to forfeiture.

17 14. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend
18 to December 19, 2025, the time in which the United States is required to file a civil complaint for
19 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant
20 currency is subject to forfeiture.

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1 15. Accordingly, the parties agree that the deadline by which the United States shall be
2 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment
3 alleging that the defendant currency is subject to forfeiture shall be extended to December 19, 2025.

4 Dated: 11/19/2025

ERIC GRANT
United States Attorney

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6 By: /s/ Kevin C. Khasigian
KEVIN C. KHASIGIAN
Assistant U.S. Attorney

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8 Dated: 11/19/2025

/s/ Isaac Safier
ISAAC SAFIER
Attorney for potential claimant
Ronnie Borrego
(Authorized by email)

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12 **IT IS SO ORDERED.**

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14 Dated: November 19, 2025

/s/ Daniel J. Calabretta
THE HONORABLE DANIEL J. CALABRETTA
UNITED STATES DISTRICT JUDGE